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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF BROOKE
GARDNER IN SUPPORT OF MOTION
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS PURSUANT TO 11
U.S.C. §§ 105(a) AND 501 AND FED. R.
BANKR. P. 3003(c) FOR ENTRY OF AN
ORDER EXTENDING THE BAR DATE**

Date: November 13, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102
Objection Deadline: November 6, 2019

1 Steven J. Skikos (SBN 148110)
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12 *Attorneys for Declarant*

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

13 In re:)	Bankr. Case No. 19-30088-DM
)	
14 PG&E CORPORATION)	DECLARATION OF BROOKE
)	GARDNER IN SUPPORT OF MOTION
15 -and-)	TO EXTEND CLAIMS BAR DATE
)	
16 PACIFIC GAS AND ELECTRIC)	Date: TBD
17 COMPANY,)	Time: TBD
)	Place: United States Bankruptcy Court
18 Debtors.)	Courtroom 17, 16th Floor
)	San Francisco, CA 94102
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)	
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)	
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23 I, Brooke Gardner, declare as follows:

- 24 1. I am over 18 years of age. I have personal knowledge of the facts contained in this
25 declaration, and if called as a witness, I could and would testify competently thereto.
- 26 2. Before the Camp Fire, I rented a home on Purdue Court in Magalia, California. I had
27 lived in Magalia my whole life until the fire, nearly 30 years.

- 1 3. The morning of the fire, my husband and I were working from home. I saw smoke
2 and billows outside. There were high winds. We started to pack essentials, and I
3 called my sister and told her to get out. My husband went to check on an elderly
4 neighbor. He saw the smoke closing in on our home, and we fled with our two
5 young children (3-year-old son and 10-month-old daughter).
- 6 4. We tried to go to south to Paradise. We didn't realize the fire was there. The roads
7 were blocked so we turned around to go north. We were low on gas and it took us an
8 hour to refuel. Cars were running into each other, and the gas station was chaos. The
9 fire was a 1/4 mile away. While we were waiting for gas, we saw the smoke coming
10 towards us. We thought we would have to ditch the car and make a run for it with
11 our children.
- 12 5. We decided to take a small dirt road that I knew about. We slowly inched our way to
13 Chico. From the time we left until the time we got to Chico, it took 6 hours for us to
14 get to safety. We barely escaped. I thought I was going to lose my children and my
15 life. My family and I are still dealing with the emotional trauma, not to mention the
16 financial difficulties.
- 17 6. The home and all our possessions were completely destroyed, except for the few
18 items we kept in storage. Immediately before the fire, we had begun the process of
19 remodeling the home at our own expense. We had just canceled our renter's
20 insurance because we were preparing to purchase the home. We then decided not to
21 for reasons unrelated to the fire. But when the fire struck, we were still renters, and
22 we have no insurance coverage to pay for our losses.
- 23 7. Following the fire, we were unable to afford housing anywhere in California. We
24 were forced to relocate over 500 miles away in late November and now live in
25 Caldwell, Idaho. It was very hard to move away from all our good friends and family
26 and the community I lived in for my entire life.
- 27 8. I was also forced to resign from my job. Currently, I'm out of work.
- 28

1 9. I do not recall ever receiving notice from PG&E about the bankruptcy or the claims
2 process. I had no idea that I was even entitled to file a claim. I thought bankruptcy
3 meant the case was over.

4 10. A close friend of mine called to tell me that I was eligible to file a claim. If it wasn't
5 for her, I would not have learned of my rights. She encouraged me to file. I learned
6 that renters are eligible, and there is money available to compensate my family and
7 the other fire survivors for our losses. I didn't learn any of this from PG&E. I
8 certainly never received any communication from PG&E telling me that there is
9 money available to pay for my losses in the bankruptcy.

10 11. I am afraid there are many people in my position who do not know they can recover
11 their losses by filing a claim. I am also afraid that they do not know about the
12 deadline coming up.

13 12. I'm afraid many people in my position will not get the information in time.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this
15 6th day of October, 2019 in Caldwell, Idaho.

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18 Brooke Gardner
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